

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

CR 22-197 KMM

UNITED STATES OF AMERICA,

INFORMATION

Plaintiff,

18 U.S.C. § 981

v.

18 U.S.C. § 1343

21 U.S.C. § 853

MICHAEL JOHN GENNARELLI,

28 U.S.C. § 2461(c)

Defendant.

THE UNITED STATES ATTORNEY CHARGES THAT:

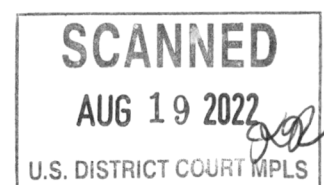
COUNT 1
(Wire Fraud)

1. From in or about 2016 and continuing through in or about 2019, in the State and District of Minnesota and elsewhere, the Defendant,

MICHAEL JOHN GENNARELLI,

devised and intended to devise a scheme and artifice to defraud and to obtain money and property from Company A, a business headquartered in the State and District of Minnesota that sells goods online as well as in stores operated by the company throughout the United States, by means of materially false and fraudulent pretenses, representations, and promises, and knowingly transmitted and caused to be transmitted writings, signs, signals, and pictures by means of wire communication in interstate commerce for the purpose of executing such scheme and artifice.

2. On or about November 25, 2018, the Defendant knowingly transmitted and caused to be transmitted writings, signs, signals, and pictures by means of wire communication in interstate commerce in furtherance of the aforementioned scheme



United States v. Michael John Gennarelli

and artifice to defraud and obtain money and property from Company A by gaining unauthorized access to a computer in one of Company A's retail stores in Glendale, California and using the computer to conduct a search of Company A sales information, which was held on computers located at Company A's headquarters in Richfield, Minnesota.

All in violation of Title 18, United States Code, Section 1343.

FORFEITURE ALLEGATIONS

3. Count 1 of this Information is hereby re-alleged and incorporated as if fully set forth herein by reference for the purpose of alleging forfeitures.

4. If the Defendant is convicted of Count 1 of the Information, the Defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) in conjunction with Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to said violation of Count 1 of this Information.

5. If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

Dated: August 19, 2022

BY: ANDREW M. LUGER
United States Attorney

/s/ Chelsea A. Walcker

BY: CHELSEA A. WALCKER
Assistant United States Attorney
Attorney ID No. 0396792